

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF KEVIN GANNON IN SUPPORT OF  
PLAINTIFF’S OPPOSITION TO DEFENDANT’S  
MOTION TO ENFORCE PROTECTIVE ORDER PROVISION  
REGARDING DISCLOSURE OF PARTY CONFIDENTIAL MATERIAL  
TO THIRD-PARTY EXPERT**

I, Kevin Gannon, hereby declare as follows:

1. I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for plaintiff in this action, Singular Computing LLC (“Singular”).

2. Attached hereto as Exhibit A is a true and correct copy of Exhibit A to the Protective Order in this case signed by Professor Jose Renau.

3. Attached hereto as Exhibit B is a true and correct copy of a Press Release titled “Imagination supports Google Android GPU Inspector” that was downloaded from [www.imaginationtech.com](http://www.imaginationtech.com) on or around June 21, 2022.

4. Attached hereto as Exhibit C is a true and correct copy of excerpts from the Securities and Exchange Commission Form 10-K filed by Google LLC’s parent company (Alphabet Inc.) for the year ended December 31, 2021.

5. Attached hereto as Exhibit D is a true and correct copy of a table titled “Top Competitors of Imagination Technologies” downloaded from [www.zoominfo.com](http://www.zoominfo.com) on or around June 22, 2022.

6. Attached hereto as Exhibit E is a true and correct copy of a table titled “Top Competitors of Esperanto Technologies” downloaded from [www.zoominfo.com](http://www.zoominfo.com) on or around June 22, 2022.

7. Attached hereto as Exhibit F is a true and correct copy of an announcement dated August 24, 2021 downloaded from [www.imaginationtech.com/news/](http://www.imaginationtech.com/news/) on or around June 22, 2022.

8. Attached hereto as Exhibit G is a true and correct copy of an “Esperanto Technologies Overview” downloaded from [www.glassdoor.com](http://www.glassdoor.com) on or around June 22, 2022.

Executed at Boston, Massachusetts on June 29, 2022.

/s/ Kevin Gannon

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